

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell

It is not typical for me to get involved with decisions or proposals made by the government as I am not what anyone would consider to be "political." I make exception in this case because it affects a community of deaf citizens who have historically already been oppressed and these actions by the FCC threaten to strip them of a service that is so vital to them.

I am a Video Relay Service provider. I am the child of parents who were deaf. I am the parent of a child who is deaf. One of the joys I have in my work as a VI is seeing deaf people being able to take care of their own business, have a private conversation, share feelings, and they are doing this, and so many other things, in their own language. Deaf people have come a long way using whatever means they could to communicate--going through interpreters which compromised their privacy, using TTY/TDDs which was not in their language, and finally VRS.

Striving to continue access to VRS services and encouraging improvements in this technology should be a high priority for you as Chairmen and Commissioners of the FCC. The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide "functionally- equivalent" communications. These proposals regarding VRS rates would put an end to VRS as we know it. My employer has already informed us that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for deaf VRS users. This proposal would almost certainly mean that my job and countless others would be in jeopardy in an economy where finding a new job would be extremely difficult, if not impossible.

The rates are so low that it would end VRS as we know it today. No provider would seek to provide VRS at the low rates proposed by the FCC. What is being offered is a low interim VRS rate. A better option would be a multi-year VRS rate, which would allow VRS providers to continue to invest in their offerings for the deaf. VRS and the improvements made to it over the years have moved us closer to the goal of "functional equivalence" mandated by the Americans with Disabilities Act. We aren't asking you to "give" the deaf something---we are asking you to maintain the level of communication enjoyed by hearing individuals. The FCC rate proposal would destroy that progress and move us further from achieving the goals of the ADA.

The FCC should be increasing the availability and use of VRS, not cutting back. The FCC should

adopt a rate that promotes continuing improvements in VRS technology and the services affiliated with it. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. They provide services to assure their equipment is operational. A big expense for deaf people is the monthly payments for high-speed access. Instead of trying to cut back on VRS services you should be trying to find ways to make VRS more affordable to deaf individuals.

There have been reports that some companies are being offered much higher rates than other companies. Care should be taken to investigate what these companies do with the funds they receive. We encourage you to invest in those companies that have the best interest of the deaf as their focus. Providing quality access within the guidelines set by the FCC and companies that invest in their Vis by offering continuing training.

Recent reports of fraud in the VRS industry are disturbing to employees who work for a company that has operated within current FCC guidelines and has worked diligently to maintain the integrity of the VRS fund. The FCC needs to devote more of its time and energy to focusing on the elimination of fraud and supporting those VRS companies who do the same.

Unfortunately my father died before any of this technology was available. My mother was able to use the TTY but time after time there were misunderstandings and miscommunications because she was forced to use English text to communicate and this was not her language. Now I am experiencing this technology as it is used by my daughter who is a deaf professional. Professionally, personally, and socially she is able to take care of her own issues via VRS. VRS gives us the ability to communicate in her language without compromising the content of our conversation.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS to invest in improving VRS and reaching more individuals. The law requires it and it is the right thing to do.

As a final note I would like for you to consider the possibility that you or your family member was a user of VRS services. I don't mean for you to give this just a fleeting moment? I mean to really think about it. How could you explain going forward with the present proposal?? I know I couldn't. I pride myself with the level of service, honesty and integrity I bring to the deaf community I serve. Haven't they been oppressed enough?

?Sign?cerely,

Kathline E. Sandy